

# EXHIBIT “C”



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# Transcript of Ronald Browning, Jr.

**Date:** April 22, 2024

**Case:** Warnick -v- Delmarva Power & Light Co.

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Conducted on April 22, 2024

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1	Q	Are you at all familiar, as you sit here	10:11:13
2		today, with NFPA 70B recommended practice for	10:11:16
3		electrical equipment maintenance?	10:11:21
4	A	No.	10:11:23
5	Q	When you worked as a -- in your position	10:11:23
6		as a reliability engineer for Delmarva, were there	10:11:39
7		any particular rules or standards that you	10:11:41
8		referred to in your job?	10:11:47
9	A	Our internal standards.	10:11:50
10	Q	Okay.	10:11:52
11	A	As well as our reliability or our	10:11:52
12		reliability metrics are what we based our projects	10:11:57
13		off of.	10:12:02
14	Q	Okay. And what are those internal	10:12:03
15		standards called?	10:12:05
16	A	We have construction standards, material	10:12:11
17		standards and then distribution standards.	10:12:18
18	Q	Okay. And how are they -- are they in a	10:12:28
19		booklet? Are they online? How do you access	10:12:32
20		those standards?	10:12:34
21	A	So they used to be handed to us in	10:12:34
22		binders and kept up with -- via our standards	10:12:39

1 department. We have an internal standards  
2 department but they have since gone to a  
3 SharePoint website.

10:12:46

10:12:49

10:12:51

4 Q Are there still copies of binders  
5 around?

10:12:57

10:12:58

6 A Not that I'm aware of. I believe most  
7 of the folks that use them have since retired or  
8 had them hidden because they were sought out after  
9 our reproduction. Our repo team was kind of  
10 dissembled so we weren't able to get those as  
11 easily.

10:13:00

10:13:03

10:13:08

10:13:11

10:13:11

10:13:21

12 Q Not able to get to the paper binders?

10:13:23

13 A Correct.

10:13:26

14 Q And so after that conversion, the way to  
15 access that information was online?

10:13:26

10:13:32

16 A Correct.

10:13:34

17 Q And when did that conversion happen?

10:13:38

18 A Oh, goodness. I would say 2020,  
19 estimating.

10:13:43

10:13:47

20 Q And for -- when you worked in  
21 reliability engineering, was there a particular,  
22 of the three types of standards that you

10:13:59

10:14:05

10:14:08

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1	Q	Okay. Well, so --	10:33:35
2	A	Prior to going in.	10:33:36
3	Q	Was the lock on that door a Delmarva	10:33:38
4		lock?	10:33:42
5	A	No.	10:33:43
6	Q	Okay. And do you know who controlled	10:33:49
7		the lock on the door at Sea Colony?	10:33:57
8	A	Sea Colony HOAs.	10:34:02
9	Q	Okay. Before -- when -- do you know	10:34:16
10		when in time it was that you saw this type of	10:34:39
11		switch at Sea Colony?	10:34:43
12	A	Early -- estimating early 2019. I know	10:34:46
13		it was 2019. I want to say January or February.	10:34:49
14	Q	And was it around the same time that you	10:34:58
15		saw the knife blade switches at Oceana?	10:35:02
16	A	Correct.	10:35:17
17	Q	And before that, had you ever seen a	10:35:17
18		knife blade switch in your life?	10:35:21
19	A	In pictures and on our standards manual.	10:35:24
20	Q	Where are the knife blade switches	10:35:32
21		pictured in the standards manual?	10:35:34
22	A	In the materials manual. I don't recall	10:35:38

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1	are others?	10:40:57
2	A These are all the photos that I took.	10:41:03
3	Q Okay.	10:41:07
4	A Of Sea Colony as well as at the Oceana?	10:41:07
5	Q Okay.	10:41:10
6	MR. FOLEY: So Mr. Browning forwarded me	10:41:12
7	the photos and I forwarded you. I think I made	10:41:14
8	that representation.	10:41:14
9	Q Okay. And so where are these photos	10:41:19
10	maintained by you?	10:41:22
11	A They were in my old reliability folder	10:41:25
12	on our shared drive but I tried to access the	10:41:29
13	whole folder the other day and I lost a bunch of	10:41:33
14	information or I don't have access to it anymore.	10:41:37
15	Q Okay. And so when you went to Sea	10:41:41
16	Colony, who was with you?	10:41:51
17	A Oh, a trouble and service man which we	10:41:55
18	also refer to as our switch persons and one	10:41:59
19	supervisor, or actually two supervisors and	10:42:08
20	Patrick Dubinski, estimating.	10:42:16
21	Q Okay. Who was the trouble and service	10:42:17
22	man when you went up?	10:42:24

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1 little bit of a larger trip than what I put 11:30:18  
2 together at Sea Colony to go through. We went 11:30:22  
3 through two different places in Ocean City but I 11:30:26  
4 only had my iPad on me for the one at the Oceana. 11:30:32

5 Q Okay. So we were provided with a set of 11:30:40  
6 photos under the label Ocean City and it's 48 11:30:45  
7 photos, and are these all photos just of the 11:30:53  
8 Oceana condo? 11:31:00

9 A Correct. 11:31:02

10 MR. FOLEY: Just so we're on the same -- 11:31:02  
11 you're referring now to Exhibit 2, correct? 11:31:02

12 MR. TIMONEY: Yes, sorry, Browning 2. 11:31:02  
13 Yes. 11:31:02

14 Q Okay. And when you -- first off, why 11:31:16  
15 did you and Patrick decide to go to Ocean City? 11:31:23

16 A Because Ocean City has high-rises just 11:31:28  
17 as Sea Colony so they're similar to Sea Colony. 11:31:33  
18 So I figured if he's seeing the same issues that I 11:31:39  
19 am and also hearing the same stories that I am, 11:31:44  
20 let's go take a look and see if we can get a plan 11:31:46  
21 together to make all this infrastructure better. 11:31:46

22 Q Okay. And so were there e-mails between 11:31:55

1       you and Patrick Dubinski as to what you were doing       11:31:57

2       or planning to do or the reason for the trip?       11:31:57

3             A       Oh, I'm sure. There's probably e-mails,       11:32:03

4       phone calls.       11:32:06

5             Q       All right. And did your supervisor know       11:32:11

6       you were going to Ocean City?       11:32:17

7             A       Correct.       11:32:19

8             Q       And was it the same supervisor?       11:32:19

9             A       Yes.       11:32:23

10            Q       And did your supervisor have any input       11:32:23

11       into what you should look for or photograph when       11:32:25

12       you went there?       11:32:25

13            A       No.       11:32:28

14            Q       Did your supervisor review the       11:32:29

15       photographs that you took at Sea Colony?       11:32:31

16            A       I don't recall. I believe I may have       11:32:34

17       showed her but I can't confirm.       11:32:39

18            Q       And did you have any conversations with       11:32:42

19       anyone else at Delmarva about seeing an issue at       11:32:45

20       Sea Colony with unauthorized access to electrical       11:32:51

21       rooms?       11:32:56

22            MR. FOLEY: Objection, form and       11:32:59